

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**ETHAN AYALA,  
WILLIAM MEJIA, and  
JOHARIEL QUEZADA**

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**Criminal Case No. 22-CR- 70-PB (1/3)**

**INDICTMENT**

**The Grand Jury charges:**

**COUNT ONE**

(Conspiracy to Steal Firearms from Federal Firearm Licensee – 18 U.S.C. §§ 371, 922(u))

**Background**

At all times relevant to Count One of this Indictment:

1. Milford Firearms was a Federal Firearms Licensee and was a business engaged in the retail sale of firearms. The business premises were in Milford, New Hampshire. The firearms in its business inventory included firearms that had been shipped and transported in interstate commerce.

2. Second Amendment Arms was a Federal Firearms Licensee and was a business engaged in the retail sale of firearms. The business premises were in Windham, New Hampshire. The firearms in its business inventory included firearms that had been shipped and transported in interstate commerce.

3. MacPherson Firearms was a Federal Firearms Licensee and was a business engaged in the retail sale of firearms. The business premises were in Brentwood, New

Hampshire. The firearms in its business inventory included firearms that had been shipped and transported in interstate commerce.

The Offense

4. Between on or about August 29, 2021, and on or about October 4, 2021, in the District of New Hampshire and elsewhere, the defendants,

**ETHAN AYALA,  
WILLIAM MEJIA,  
and  
JOHARIEL QUEZADA,**

knowingly and willfully conspired and agreed with each other and with persons known and unknown to the grand jury to commit the offense of stealing firearms from the premises and in business inventories of Federal Firearm Licensees, namely, Milford Firearms, Second Amendment Arms, and MacPherson Firearms.

Object of the Conspiracy

5. It was the object of the conspiracy to steal firearms from the premises and business inventories of Federal Firearm Licensees, specifically, Milford Firearms, Second Amendment Arms, and MacPherson Firearms.

Manner and Means of the Conspiracy

6. It was part of the conspiracy that on August 31, 2021, one or more of the conspirators traveled to the premises of Milford Firearms and stole firearms from its business inventory

7. It was part of the conspiracy that on September 24, 2021, one or more of the conspirators traveled to Second Amendment Arms and stole firearms from its business inventory.

8. It was part of the conspiracy that on October 1, 2021, one or more of the conspirators traveled to MacPherson Firearms and stole firearms from its business inventory.

Overt Acts

9. In furtherance of the conspiracy and to effect the object of the conspiracy, one or more of the conspirators committed at least one of the following overt acts, among others, in the District of New Hampshire, and elsewhere:

- a. On or before August 31, 2021, one or more of the conspirators obtained a stolen Hyundai Sonata and a stolen Honda Pilot;
- b. On or about August 31, 2021, two conspirators traveled in the stolen Hyundai Sonata from Massachusetts to Milford Firearms in Milford, New Hampshire;
- c. On or about August 31, 2021, one conspirator traveled in the stolen Honda Pilot from Massachusetts to Milford Firearms in Milford, New Hampshire;
- d. On or about August 31, 2021, Johariel Quezada, William Mejia, and a conspirator broke into Milford Firearms, and stole the following firearms, each of which belonged to and were in the business inventory of Milford Firearms, and each of which had been shipped and transported in interstate commerce:

Manufacturer	Model	Caliber	Type	Serial Number
Smith & Wesson	2.0 M&P	9mm	Pistol	NJZ5805
Smith & Wesson	2.0 M&P	40	Pistol	NKN6370
Smith & Wesson	2.0 M&P	40	Pistol	NKR4391
Smith & Wesson	2.0 M&P	9mm	Pistol	NKU3795
Smith & Wesson	2.0 Shield	9mm	Pistol	REY4898
Smith & Wesson	M&P 9	9mm	Pistol	HRL2216
Smith & Wesson	PC Shield	380	Pistol	REU6492
Smith & Wesson	Shield EZ	380	Pistol	NKJ6349
Smith & Wesson	Shield EZ	380	Pistol	REE3045
Smith & Wesson	Shield EZ	9mm	Pistol	RJV7842
Smith & Wesson	2.0 Shield	40	Pistol	NFY3828
Smith & Wesson	M&P40	40	Pistol	JHC1352
Sig Sauer	P210	9mm	Pistol	59B012586
Sig Sauer	P365x	9mm	Pistol	66B588811
Sig Sauer	P226 Legion	9mm	Pistol	47E085110
Sig Sauer	P226 MK 25	9mm	Pistol	47E088390
Taurus	PT 145 Pro	45 ACP	Pistol	NET64365

Walther	PPQM2	45 ACP	Pistol	FDF9420
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e. On or about August 31, 2021, Johariel Quezada, William Mejia, and a conspirator placed the firearms in the stolen vehicles and left in the vehicles;

f. On or about September 1, 2021, William Mejia, Johariel Quezada, and a coconspirator abandoned the stolen Hyundai Sonata in Haverhill, Massachusetts;

g. On or about September 24, 2021, one or more of the conspirators obtained a stolen Jeep;

h. On or about September 24, 2021, two or more conspirators traveled in the stolen Jeep from Massachusetts to Second Amendment Firearms in Windham, New Hampshire;

i. On or about September 24, 2021, two conspirators broke into Second Amendment Firearms and stole the following firearms, each of which belonged to and were in the business inventory of Second Amendment Firearms, and each of which had been shipped and transported in interstate commerce:

Manufacturer	Model	Caliber	Type	Serial Number
Caracal	AR15	5.56	Rifle	WEA170095
Smith & Wesson	M&P 15/22	22 LR	Rifle	DFP9382
Diamondback	DB15	5.56	Rifle	DB2484563
Aero Precision	M5	308	Rifle	US37407

j. On or about September 24, 2021, two conspirators placed the firearms in the stolen Jeep, got into the Jeep, and drove away from the premises;

k. On or before October 1, 2021, one or more conspirators obtained a stolen Honda HRV;

l. On or about October 1, 2021, four conspirators traveled in the stolen Honda HRV from Massachusetts to MacPherson Firearms in Brentwood, New Hampshire;

m. On or about October 1, 2021, Ethan Ayala and three conspirators traveled in the stolen HRV from Massachusetts to MacPherson Firearms in Brentwood, New Hampshire;

n. On or about October 1, 2021, Ethan Ayala and two conspirators broke into MacPherson Firearms and stole the following firearms, each of which belonged to and were in the business inventory of MacPherson Firearms, and each of which had been shipped and transported in interstate commerce:

Manufacturer	Model	Caliber	Type	Serial Number
Glock	19	9mm	Pistol	BTXB626
Smith & Wesson	Bodyguard 380	380 ACP	Pistol	KHY7264
Beretta	M9	9mm	Pistol	M9-237882
Tristar (Kral Arms)	Cobra III Marine	12 GA	Shotgun	KRP035916
Remington	870 Express	12 GA	Shotgun	RAS007205
Springfield Armory (HS Produkt/IM Metal)	Hellcat OSP	9mm	Pistol	BA493091
Smith & Wesson	M&P 9 Shield	9mm	Pistol	HWE7906
Ruger	Security-9	9mm	Pistol	384-93895
Ruger	EC9s	9mm	Pistol	459-83426
Glock	42	380 ACP	Pistol	AFWX483
Heritage MFG	Rough Rider	22 LR/WMR	Revolver	3PH098921
Heritage MFG	Rough Rider	22 LR/WMR	Revolver	3PH098921
Glock	43	9mm	Pistol	AGBE172
MacPherson Firearm	MFAR-15	5.56	Pistol	NH150259
Taurus	M44 Tracker	44 Mag	Revolver	KS70534
MacPherson Firearm	47SF	7.62x39	Rifle	D002400
Smith & Wesson	SD9VE	9mm	Pistol	FDN7624
Smith & Wesson	SD9VE	9mm	Pistol	FDN3977
Glock	45	9mm	Pistol	BUKD715

o. On or about October 1, 2021, Ethan Ayala and two conspirators placed the firearms in the stolen Honda HRV, got into the vehicle, and drove away from the premises;

p. Between on or about October 1, 2021, and October 4, 2021, William Mejia possessed the following firearm stolen from MacPherson Firearms on October 1, 2021: a MacPherson Firearms, model MFAR-15 5.56mm caliber pistol, s/n NH150259; and

q. On October 4, 2021, Johariel Quezada possessed the following two firearms stolen from MacPherson Firearms on October 1, 2021: a MacPherson Firearms, model MFAR-15 5.56mm caliber pistol, s/n NH150259; and a MacPherson Firearms, model 47SF, 7.62x39 caliber rifle, s/n D002400.

All in violation of Title 18, United States Code, Sections 371 and 922(u).

Dated: June 13, 2022

A TRUE BILL

/s/ Foreperson of the Grand Jury  
Foreperson of the Grand Jury

JANE E. YOUNG  
United States Attorney  
District of New Hampshire

By: /s/ Anna Z. Krasinski  
Anna Z. Krasinski  
Assistant U.S. Attorney